

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

M.C.	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	CASE NO: 2:09-CV-03240
v.	:	
	:	
ANTHONY MARK BIANCHI,	:	
	:	
Defendant.	:	

RULE 41(a)(1)(A) NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE

Plaintiff, M.C., pursuant to Federal Rule of Civil Procedure 41(a)(1)(A) files this notice and states:

1. Defendant Anthony Mark Bianchi did not serve an answer or a motion for summary judgment in the instant suit. See Fed. R. Civ. P. 41(a)(1)(A)(i) (providing for dismissal “Without a Court Order” when opponent serves neither an answer nor a motion for summary judgment).
2. Plaintiff dismisses his claims against defendant Anthony Mark Bianchi with prejudice.
3. Plaintiff expressly reserves on the sole issue of this Court’s jurisdiction to determine validity and amount of fees and costs if any under the claim of charging lien filed by Frost Van den Boom & Smith, P.A. on September 23, 2010 in the above-captioned action.

Respectfully submitted on June 14, 2011.

GHERMAN LEGAL PLLC  
Attorney for Plaintiff  
The Ingraham Building, Eighth Floor  
25 Southeast Second Avenue  
Miami, Florida 33131  
Telephone: (305) 582-5700  
E-mail: sgherman@ghermanlaw.com

By: s/Sergiu Gherman  
Sergiu Gherman, Esquire  
Florida Bar No.: 37031

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above document was electronically filed using the ECF system, and thereby was served upon Michael S. Bomstein, attorney for defendant Anthony Mark Bianchi, on June 14, 2011.

By: s/Sergiu Gherman